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July 8, 1998

Via Fax and First Class Mail

Abigail Shane, Esq.
Mark Shonkwiler, Esq.
Marc Allen, Esq.
Rhonda Vosdingh, Esq.
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 4407 et al.

Dear Ms. Shane, Ms. Vosdingh and Messrs. Shonkwiler and Allen:

This will follow up our meeting on June 30, 1998, at which Joe Birkenstock and I had the opportunity to discuss with you the status of production of documents by our client, the Democratic National Committee ("DNC"), in response to subpoenas and/or requests issued in the above-referenced groups of MURs. We greatly appreciate the willingness of the Office of General Counsel to attempt to coordinate and prioritize these document requests, and to work with us to try to develop a plan for production of documents in the investigation in a way that will meet OGC's needs while recognizing the DNC's legal obligations to comply with numerous other, outstanding, prior subpoenas from other federal investigative authorities and congressional committees.

Based on the discussions of OGC's priorities for DNC document production in each of these investigations, we would propose the following document search and production plan and timetable for each investigation, with the understandings that,

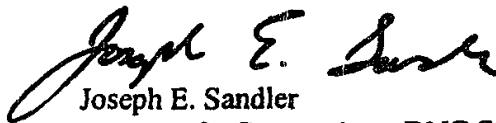
- (i) if in the course of implementing this plan, the DNC discovers other or additional sources of documents that seem reasonable to search for documents responsive to the subpoenas or document requests, we may propose modifying this plan in consultation with the assigned OGC attorney(s); and
- (ii) our ability to meet the proposed timetables is subject to demands for re-prioritization of our searches from other investigative authorities and congressional committees pursuant to prior outstanding subpoenas.

MURs 4407 et al.

In accordance with the priorities discussed with Ms. Vosdingh, we plan to undertake the following searches. Dates given are approximate dates for production to the Commission of responsive documents identified in the course of these searches:

- A. Spreadsheets showing funds transferred to state parties, on disc—by July 17
- B. Joe Sandler "Generic Media" notebooks including scripts, draft scripts, spreadsheets of planned media buys, correspondence with state parties, etc.—by July 17
- C. Joe Sandler notes taken during "creative meetings"—by August 14
- D. Contracts/draft contracts with Squier Knapp Ochs and/or November 5 Group and related correspondence, memos and notes—by August 14
- E. Don Fowler paper files archives, on a targeted basis, to the extent feasible--by August 31
- F. Correspondence with state parties other than that located in Sandler notebooks, through a targeted search, to the extent feasible, of Campaign and Communications Division paper archives—by September 30

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Joseph E. Sandler".

Joseph E. Sandler
Attorney for Respondents DNC Services
Corporation/Democratic National
Committee and Carol Pensky, as Treasurer